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**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF WYOMING**

NADIA ZAHMOUL, an individual,	)	Case No.: 2:22-cv-00221-ABJ
	)	
Plaintiff,	)	
vs.	)	
	)	
NBH BANK, d/b/a Bank of Jackson Hole, a	)	
division of NBH Bank,	)	
	)	
Defendant.	)	
	)	
	)	

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**JOINT MOTION FOR ENTRY OF A PROTECTIVE ORDER**

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Pursuant to Fed. R. Civ. P. 26(c), Plaintiff Nadia Zahmoul (“Plaintiff”) and Defendant NBH Bank, d/b/a Bank of Jackson Hole, a division of NBH Bank (“BOJH,” and collectively with Plaintiff, the “Parties”), jointly move the Court for an order approving the Protective Order attached hereto as Exhibit A. In support of this motion, the Parties state as follows:

1. The Parties recognize that BOJH is bound by the Gramm-Leach-Bliley Act and any applicable regulations promulgated thereunder. As relevant here, the Parties anticipate requesting personally identifiable financial information (i) provided to BOJH by a consumer or customer (as each of those terms are defined in Title V of the Gramm-Leach-Bliley Act and its implementing regulations); (ii) resulting from any transaction between BOJH and a consumer or any service

performed by BOJH for a consumer; or (iii) otherwise obtained by BOJH about the consumer—all of which is protected from disclosure by Title V of the Gramm-Leach-Bliley Act. *See* 15 U.S.C. § 6801.

2. Disclosure of the above information, however, may be made in conjunction with judicial proceedings. *See* 15 U.S.C. § 6802(e)(8). In an effort to expedite discovery, the entry of a Protective Order would authorize the requested disclosures, but would limit the use of the information above to this litigation and ensure that the individuals to whom the information belongs (Plaintiff and non-parties) are not subjected to annoyance and embarrassment as a result of the disclosures. *See* Fed. R. Civ. P. 26(c).

WHEREFORE, for the reasons set forth above, and pursuant to Fed. R. Civ. P. 26(c), the Parties request that the Court enter the attached Protective Order so as to expedite and simplify discovery for good cause shown.

Respectfully submitted this 8th day of February, 2023.

/s/ Robert V. Cornish, Jr.

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on February 8, 2023, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system. Any other counsel of record will be served in accordance with the Federal Rules of Civil Procedure.

*s/ Nathaniel T. Vasquez*

Nathaniel T. Vasquez